

**IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF ARKANSAS  
CENTRAL DIVISION**

**JANICE HARGROVE WARREN**

**PLAINTIFF**

v.

**Case No. 4:19-cv-00655-BSM**

**MIKE KEMP, et al.**

**DEFENDANTS**

**TIME RECORD  
SARAH HOWARD JENKINS**

DATE	ACTIVITY	TIME	CHARGE
7/06/19	Review Paul Brewer's Deposition (Beasley v. McNulty)	2 hrs.	\$730.00
7/07/19	Review Depositions: Dr. Remele & Dr. McNulty (Beasley v. McNulty)	3 hrs.	\$1095.00
7/11/19	Meet with Dr. Warren	1 hr. 45 mins.	\$456.25
7/12/19	Review proof structures	1 hr. 25 mins.	\$638.75
7/17/19	Text & Email Dr. Warren; Review EEOC Charge and Response; Develop discovery goals	1 hr. 15 mins.	\$456.25
7/29/19	Email from Dr. Warren, reply with attachment	4 mins.	\$24.33
7/31/19	Draft complaint: Parties	30 mins.	\$182.50
8/01/19	Draft complaint: Jurisdiction	45 mins.	\$273.75
8/02/19	Draft complaint: Begin Statement of Facts	1 hr. 30 mins.	\$547.50
8/06/19	Review community support documents, candidate profiles, draft complaint	3 hrs. 50 mins.	\$1399.17
8/10/19	Review file materials and draft complaint	3 hrs.	\$1095.00
8/16/19	Draft complaint	2 hrs. 40 mins.	\$973.33
8/17/19	Draft complaint and develop exhibits: online search for Black Hawk District Wisconsin (McNulty), Houston Independent School District (Pruitt), and the Daniel Boone Pennsylvania District (Harris); review data from NCES and Niche.com	2 hrs. 50 mins.	\$1034.17
8/19/19	Draft complaint and develop exhibits	2 hrs. 30 mins.	\$912.50
8/20/19	Prepare candidate comparison exhibit; online review of the Wisconsin Department of Public Instruction (McNulty) reports of district revenue sources and pupil enrollment	4 hrs.	\$1460.00

8/21/19	Emails to and from Dr. Warren re pupil enrollment, and exhibit review, draft complaint.	4 hrs. 10 mins.	\$1520.83
8/22/19	Draft complaint; Evaluate Retaliation Claim Title VII	4 hrs. 10 mins.	\$1520.83
8/23/19	Research Retaliation Claim under 1981, 1983, draft Retaliation Claims, edit Complaint, edit candidate comparison chart	9 hrs.	\$3285.00
8/24/19	Conference call with Dr. Warren	20 mins.	\$121.67
8/28/19	Conference with Dr. Warren: review and edit Complaint	1 hr. 30 mins.	\$547.50
8/28/19	Draft Relief sought portion of Complaint	10 mins.	\$60.83
8/29/19	Draft Relief sought portion of Complaint	45 mins.	\$273.75
8/30/19	Research case authority for inclusion	3 hrs. 35 mins.	\$1307.92
9/01/19	Research, supplement, and revise citations	1 hr. 50 mins.	\$669.17
9/05/19	Proofread Complaint	1 hr.	\$365.00
9/09/19	Prep for 9/10/19 meeting; revise Complaint	5 hrs. 20 mins.	\$1946.67
9/10/19	confer with Dr. Warren	2 hrs.	\$730.00
9/13/19	Print and deliver Complaint to Bequette Billingsley & Kees	30 minutes	\$182.50
9/17/19	Call from Cody Kees	2 mins.	\$12.17
9/19/19	emails from Jay Bequette, call to Jay Bequette, draft extension agreement, email Jay Bequette; call from Dr. Warren	90 mins.	\$547.50
10/05/19	email from Cody Kees, re demand	5 mins.	\$30.42
10/06/19	review 8th Circuit discounting to present value rule; evaluate damage demand; draft reply to Cody Kees email; email Dr. Warren	90 mins	\$547.50
10/07/19	Review 8th Circuit authority on punitive damages, email from Cody Kees, reply to No Counter Offer email	1 hr. 30 mins.	\$547.50
10/23/19	Email Summons & Complaint to Cody Kees	10 mins.	\$60.83
10/24/19	Email to and from Cody Kees (3)	10 mins.	\$60.83
11/03/19	email from and to Cody Kees	5 mins.	\$30.42
11/11/19	Review opposition cases to support extension to relevant illegal conduct in violation of other federal or state statute.	40 mins.	\$243.33
12/13/19	Draft Proposed Joint Conference Report	1 hr. 40 mins.	\$608.33
12/29/19	Draft Preservation of Electronic Evidence Request	1 hr. 20 mins.	\$486.67
12/30/19	Review and finalize Proposed Joint Conference Report, text message to Dr. Warren	2 hrs.	\$730.00
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01/01/20	Emails to and from Dr. Warren	30 mins.	\$182.50
01/02/20	Emails to and from Dr. Warren	5 mins.	\$30.42
01/06/20	Finalize Preservation Request, revise Proposed Joint 26f Report and email Cody & Jay	1 hr.	\$365.00

01/14/20	Draft Plaintiff's First Set of Requests for Production of Document; research Waterloo Community School District	4 hrs. 30 mins.	\$1460.00
01/15/20	Revise First Set of Requests for Production of Documents	45 mins.	\$273.75
01/16/20	Launch video conference with Cody Kees; host video conference, discuss and review 26f conference report, revise conference report, file report with clerk of the court, email Dr. Warren	30 mins.	\$182.50
01/19/20	Locate contact info for Bill Newman; Locate process server in Mountain Home, AR; Review Ray & Associate's Proposal for Juneau District and draft subpoena	3 hrs. 25 mins.	\$1247.08
01/21/20	Call from Ryan Ray, President of Ray and Associates, email to Ray and Associates, email to Dr. Warren	30 mins.	\$182.50
01/23/20	email from Cody Kees, review 1st Set Interrogatories, email Dr. Warren	10 mins.	\$60.83
01/27/20	draft email for service of summons on Ray & Associates	15 mins.	\$91.25
2/05/20	Review and revise proposed Protective Order	2 hrs. 15 mins.	\$821.25
2/12/20	read and respond to email from Cody Kees re Agreed Protective Order, finalize order for filing with the Court	3 hrs. 15 mins.	\$1186.25
2/13/20	Draft Mandatory Disclosures, calls from Janice Warren, serve Initial Disclosures; amend disclosures, serve amended initial disclosures.	4hrs 55 mins.	\$1794.58
2/18/20	Text messages from and to Janice Warren	10 mins.	\$60.83
2/19/20	Response and Objection to Defendants' Document Production	4 hrs. 40 mins.	\$1703.33
2/20/20	email from and to Faith Durham (Kee's office) Finalize and email Reply to Defendants' Responses Retrieve flash drive with Defendants' Responses to Plaintiff's Document Request; Meet with Dr. Warren to review responses to Interrogatories	4 hrs.	\$1460.00
2/24/20	Draft Responses to Defendants' Interrogatories emails from and to Defendants' atty Cody Kees; email to Janice Warren; email from and to Cody Kees; organize files	6 hrs. 30 mins.	\$2372.50
02/25/20	Call to Judge Miller's chambers regarding Agreed Protective Order	5 mins.	\$30.42
2/26/20	Read and reply to emails from Cody Kees and Dr. Warren;	5 mins.	\$30.42

02/27/20	Calls to Janice Warren, email to Cody Kees regarding final scheduling order, notes re McNulty subpoena	40 mins.	\$243.33
02/27/20	Review email from Cody Kees and 2nd Defendant Interrogatories and document request	10 mins.	\$60.83
03/02/20	Review document supplement from Defendants	30 mins.	\$182.50
03/03/20	Text messages from and to Dr. Warren, call from Dr. Warren; Review document production, review case authority on defendants alleged personal privacy privilege	2 hrs. 10 mins.	\$790.83
03/04/20	Review case authority on personal privacy privilege and draft replies to seven defendants' responses; email serve on Cody Kees & Jay Bequette	15 hrs.	\$5475.00
03/05/20	Review document production (District Docs)	1 hr.	\$365.00
03/06/20	calls to witness re date of trial and scope of testimony; update witness list; review FOIA cases on personal versus public record, and FOIA and Attorney/client privilege; Draft Rule 45 Subpoena for McNulty	3 hrs. 10 mins.	\$1155.83
03/09/20	Revise document request (McNulty); Call to process server; email subpoena	50 mins.	\$304.17
03/10/20	Review document production (District Docs)	40 mins.	\$243.33
03/11/20	Review document production (District Docs) Review document production (Remele's Docs)	4 hrs.	\$1460.00
03/15/20	Pay Davis Process (McNulty service); Draft notes from review of Remele's Docs	4 hrs. 50 mins.	\$1764.17
03/16/20	Review Ray and Associate documents	2 hrs.	\$730.00
03/17/20	Call from Dr. Warren; Draft 3rd Reply to Defendants' document production, review doc production,	3 hrs.	\$1095.00
03/18/20	Review email from Cody Kees, research FOIA and public meetings, executive sessions and notice, pull Maxtrix for candidate consensus and related docs; visit with Dr. Warren. Research the scope of Fed. R. Civ. Pro.	7 hrs.	\$2555.00
03/19/20	Research FOIA & Attorney-client privilege; draft supplemental disclosures, email Cody Kees draft interrogatories and motions in limine list	9 hrs.	\$3285.00
03/20/20	text messages to Dr. Warren Revise Interrogatories	2 hrs. 10 mins.	\$790.83
03/21/20	Draft motion to compel and accompanying memorandum of points and authorities	6 hrs. 20 mins.	\$2311.67
03/22/20	Draft documents for motion to compel, review FOIA	1 hr. 40 mins.	\$608.33

3/25/20	draft accompanying memorandum of points and authorities	8 hrs. 50 mins.	\$3224.17
03/26/20	Distinguish FOIA standard revise memorandum finalize motion & memorandum supplement citations	6 hrs.	\$2190.00
03/27/20	Final edit of Memorandum, verify citations, compile exhibits and file documents	2 hrs.	\$730.00
03/30/20	Prepare Document Production, text messages to Dr. Warren; call from Dr. Warren; Document Review	9 hrs.	\$3285.00
03/31/20	Prepare Document Production, organize documents, rescan, apply bates numbers; Research waiver of attorney/client privilege	1 hr.	\$365.00
04/01/20	Review Fed. R. Evid. 502 cases; draft privilege log, produce responses to Defendant's 2nd Set of Interrogatories; email Cody Kees	3 hrs.	\$1095.00
04/06/20	Calls to Oliver Dillingham(ADE), Carl Davis, email(s) Dr. Warren, draft and email FOIA #2; draft and email Plaintiff's 3rd document request, email from Cody Kees, review Fed. Rule Civil Pro. 30 (depositions), email Cody Kees, Deposition preparation with Dr. Warren	3 hrs. 20 mins.	\$1216.67
04/07/20	Call from Oliver Dillingham (ADE); email Oliver Dillingham, review McNulty file, email Dr. Warren; Pull documents from McNulty's subpoenaed docs	1 hr. 45 mins.	\$638.75
04/08/20	Attend Dr. Warren's Deposition Deseg Case; Calls and email to Dr. Warren; emails; calls to Devin Bates	5 hrs.	\$1825.00
04/09/20	Call to Dr. Warren; Call to Ray and Associates, email Ray and Associates; Review Warren's response to Remele allegations; Draft Sworn Declaration	1 hr. 50 mins.	\$669.17
04/10/20	Prepare for call to Dr. Jerry Guess, review Arkansas School Board Handbook; call to Watson Chapel School, call to Dr. Warren,	3 hrs.	\$1095.00
04/11/20	Review email from Dr. Warren, revised Sworn Statement, call from Dr. Warren, visit Baldwin & Shell & DW&W websites.	1hr 45 mins.	\$638.75
04/12/20	Revise Sworn Declaration; research Rule 24 Intervention	3 hrs.	\$1095.00
04/13/20	Review 8th Circuit jurisprudence on Collateral Estoppel, text messages to Dr. Warren, and finalize Sworn Declaration	7 hrs.	\$2555.00

	Call to Dr. Jerry Guess; call to Denise Palmer; pull Margie Powell's facilities report		
04/14/20	Call and text to architect Duckery, call to Dr. Jerry Guess, Call to Dr. Warren; text messages to Duckery, draft FOIA #3, email to Cody Keys.	4 hrs.	\$1460.00
4/15/20	Calls to and from Roy Horsey Baldwin & Shell emails to and from Roy Horsey	10 mins.	\$60.83
4/16/20	Emails to and from Process server regarding Duckery subpoena; email from and to Skip Davidson, Wittenberg's atty; email from and to Bushman court reporter; Review Warren's deposition and distribute affidavit to all legal counsel	1 hr. 20 mins.	\$486.67
4/17/20	emails to Cody Kees regarding extension; emails to court reporter for Duckery deposition; reply to Skip Davidson's email regarding agreement on discovery	15 mins.	\$91.25
4/20/20	Draft meeting agenda for 4/21/2020 meeting with Warren; update FOIA Responses; Draft status of Defendants' responses, review and calendar balance of Warren's outstanding discovery, pull materials for Ray & Associates interview, draft questions	3 hrs.	\$1095.00
4/21/20	Telephone conference with Dr. Warren; Review Remele documents to prepare questions for Ray & Associate Consultants	4 hrs. 30 mins.	\$1642.50
4/22/20	Calls from Dr. Warren; Review responses to interrogatories, review Cody Kee's emails, organize response; draft email to Dr. Carl Davis	2 hrs. 20 mins.	\$851.67
4/23/20	Research Rule 33_Interrogatories_signature and personal responses; Call to Newman, call to Davis, draft general and specific objections to defendants' responses; email general objection to Cody Kees	7 hrs. 20 mins.	\$2676.67
4/26/20	Draft Reply to individual defendants' responses	6 hrs.	\$2190.00
4/27/20	Draft Reply to individual defendants' responses	4 hrs. 20 mins.	\$1581.67
4/28/20	Review Documents from McNulty Subpoena, email Dr. Carl Davis & Molly Schwartzhoff, review Judge Miller's order, complete Reply to individual defendants' responses, edit replies to Gillen and Keller	10 hrs.	\$3650.00
4/29/20	Proofread Reply to Remele's responses, research and add Objection #2 to all Replies, emails to and from Cody Kees; Call from Dr. Carl Davis; Prepare phone interview of Dr. Carl Davis; Call to Dr. Carl Davis	4 hrs. 40 mins.	\$1709.42

4/30/20	Prepare Verification; email verification; Prepare supplementation of Responses to Defendant's Interrogatories 1 & 2; call Dr. Warren; email and text Dr. Warren	2 hrs.	\$730.00
5/04/20	Draft FOIA #5, text message Dr. Warren, serve FOIA request, draft and email Cody Kees a demand for resolution of dispute regarding Defendants Responses to Plaintiff's First Set of Interrogatories	2 hrs. 20 mins.	\$851.67
5/04/20	Review case authority on FOIA & Fed Discovery, reply to Cody Kee's emails; review status of the Deseg case	3 hrs. 55 mins.	\$1429.58
5/05/20	Draft Motion to Intervene and research Memo in Support, call to Margie Powell	2 hrs.	\$730.00
5/06/20	Draft Brief in support; Attend Deseg status hearing	4 hrs. 45 mins.	\$1733.75
5/07/20	Research privity & collateral estoppel	1 hr. 30 mins.	\$547.50
5/08/20	Research privity issues	4 hrs. 20 mins.	\$1581.67
5/10/20	Review errata correction sheet for Warren's deposition; research errata correction and incorporate in by reference, draft and email recommended correction; review Warren's deposition and the errata changes.	2 hrs.	\$730.00
5/11/20	Draft Motion and Memorandum to Support Intervention	14 hrs.	\$5110.00
5/12/20	Revise Memorandum in Support; Revise Motion for Intervention, emails to and from Wittenberg's attorney; emails from Cody Kees	7 hrs. 45 mins.	\$2828.75
5/13/20	File Motion to Intervene; email Cody Kees regarding Motion to Compel #2	1 hr. 50 mins.	\$669.17
5/17/20	Review WD&D docs & file, prepare for Duckery Deposition	10 hrs. 15 mins.	\$3741.25
5/18/20	Prepare docs for deposition; Deposition of Ernest Duckery; Call from Janice Warren; Draft Summary of Pre-Sept 2017 Baldwin & Shell's change orders and email Dr. Warren; Draft Amendment to Complaint	4 hrs. 30 mins.	\$1642.50
5/19/20	Draft Plaintiff's 4th Set of Request for Documents	1 hr. 45 mins.	\$638.75
5/20/20	Email Dr. Warren, draft notices of Depositions; Email Cody Kees	1 hr.	\$365.00
5/21/20	Email Cody Kees re depositions, email Skip Rutherford, return call to Joy Springer Research 42 U.S.C.A. § 1983, collect PCSSD Minutes that reference Derek Scott's Monitoring Reports	8 hrs.	\$2920.00
5/22/20	Review FOIA requests and production; review Jan-July 2017 PCSSD board minutes; Telephone	9 hrs. 45 mins.	\$3558.75

	conference with Dr. Warren; Review Board Policies as contractual obligations		
5/24/20	Draft Breach of Contract Claim	8 hrs. 15 mins.	\$3011.25
5/25/20	Draft Motion for Leave to Amend	3 hrs. 30 mins.	\$1277.50
5/27/20	Research Standing and Intervening; email to Dr. Warren, Call to Judge Marshall's clerk re filing a reply	1 hr. 40 mins.	
5/28/20	Research Standing	2 hrs.	\$730.00
5/29/20	Review Docs for printing_Remele; Research Standing Jurisprudence	2 hrs. 45 mins.	\$1003.75
5/31/20	Research Standing, draft Reply Motion to Intervene	8 hrs.	\$2920.00
6/01/20	Draft Reply	5 hrs.	\$1825.00
6/02/20	Draft Reply	8 hrs.	\$2920.00
6/03/20	Draft motion to compel	45 mins.	\$273.75
6/04/20	Calls to Link Light (WD&D service provider), call to Ray and Associates, message Kelli Patterson, research Rule 33_Interrogatories	7 hrs.	\$2828.75
6/05/20	Research standards for responding to interrogatories; select cases; draft part 1 of Motion to Compel	5 hrs. 30 mins	\$2007.50
6/07/20	Draft motion to compel	4 hrs. 40 mins.	\$1703.33
6/09/20	Review Remele's Employment file	5 hrs. 30 mins.	\$2007.50
6/10/20	Draft Questions for Depositions (5 depositions)	6 hrs. 30 mins.	\$2372.50
6/11/20	Call from Dr. Warren, Draft Questions for Depositions (5 depositions)	11 hrs.	\$5110.00
6/12/20	Draft Questions for Depositions (5 depositions); prepare documents	3 hrs. 15 mins.	\$1186.25
6/13/20	Draft Discovery Follow up, email Dr. Warren; Draft deposition questions (6 depositions)	4 hrs. 45 mins.	\$1733.75
6/14/20	Deposition Preparation	10 hrs. 40 mins.	\$3893.33
6/15/20	Depositions & deposition preparation	10 hrs. 30 mins.	\$3832.50
6/16/20	Depositions	7 hrs.	\$2555.00
6/18/20	Research limitation on compensatory damages, emotional disturbance; deposition preparation with Dr Warren; meet with Dr. Warren; Draft responses to Defendants' third set of interrogatories	4 hrs. 50 mins.	\$1764.17
6/19/20	Call Bill Newman, research number for Roy Brooks, Call to Roy Brooks	50 mins.	\$304.17
6/21/20	Draft question and prepare exhibits for McNulty deposition	9 hrs.	\$3285.00
6/22/20	McNulty deposition; Warren deposition	7 hrs. 30 mins.	\$2737.50
6/24/20	Draft Supplemental Responses for Discovery, call from Dr. Warren, review Warren's responses to Remele's list of concerns	7 hrs. 45 mins.	\$2828.75

6/26/20	Email from Dr. Warren; email to Cody Supplementing Response; search WD&D flash drive, calls to Link Light;	30 mins.	\$182.50
6/28/20	Draft Reply, organize exhibits for reply	6 hrs. 15 mins.	\$2281.25
7/02/20	Organize exhibits; Review Judge Marshall's Order, call Dr. Warren, email appellate attorney, Review Judge Marshall's authority; email appellate attorney; Research equitable estoppel & intervention & collateral estoppel	4 hrs.	\$1460.00
7/03/20	Email appellate attorney; Research equitable estoppel & intervention & collateral estoppel	38 mins.	\$231.17
7/04/20	Review Timeliness of motion to intervene	1 hour	\$365.00
7/05/20	Research equitable and judicial estoppel	3 hrs. 51 mins.	\$1405.25
7/06/20	Call from Cody Kees; Review FOIA/Fed privilege law	4 hrs. 26 mins.	\$1618.17
7/08/20	Text to Dr. Warren; call with Dr. Warren, Review Desegregation docket for status of monitoring plan	6 hrs.	\$2190.00
7/09/20	Email from and to Dr. Warren; email to Cody re FOIA, email to and from Cody re joint motion to extend the Motions deadline; Draft motion email Cody Kees	1 hr. 40 mins.	\$608.33
7/10/20	Proofread Joint Motion to Extend; file motion	16 mins.	\$97.33
7/12/20	Pull phone numbers for calls	15 mins.	\$91.25
7/14/20	text to Dr. Warren; review Remele's Records; review documents provided in response to FOIA and pull some exhibits	2 hrs.	\$730.00
7/15/20	Attend Desg hearing,	2 hrs.	\$730.00
7/20/20	Review email exchanges with Cody Kees; update outstanding discovery; draft and file Status Report	6 hrs. 30 mins.	\$2378.58
7/21/20	Text to and from Dr. Warren regarding attendance at Deseg trial; Review Profile of Remele's Call Logs; Calls to Newman (2), Roy Brooks (2)	1 hr.	\$365.00
7/22/20	Draft motion to dismiss Ward & McNulty	1 hr. 30 mins.	\$547.50
7/23/20	Review letters regarding expert testimony desg trial, complete motion to dismiss	8 hrs. 9 mins.	\$2974.75
7/27/20	Texts and call to Dr. Warren re desegregation trial Call and email to Willingham re McNulty thesis Drive to Downtown & call from Dr. Warren; Attend Desegregation trial; Drive from downtown Email from and to Dr. Warren; Review Paul Brewer's Deposition	3 hrs. 30 mins.	\$1277.50
7/28/20	Attend desegregation hearing (facilities); prepare orders dismissing Ward & McNulty for emailing to Cody Kees; Draft FOIA	2 hrs.	\$730.00

7/29/20	Draft supplementation list, email Cody Kees; Research Iowa affidavit requirements, draft affidavit for Ray and Associates signature; research Board call logs and numbers called	6 hrs.	\$2190.00
7/30/20	Review emails and defendants' responses; Draft response to Cody Kees Discovery email; Review Remele & McNulty call logs & email discovery question to Cody Kees	1 hr. 40 mins.	\$608.33
7/31/20	Review FOIA materials; call Will Read (4)	30 mins.	\$182.50
8/02/20	Meet Dr. Warren for docs retrieval	30 mins.	\$182.50
8/03/20	Emails from Warren and Cody Kees, review documents for supplemental serving, prepare docs, call to Curtis Johnson	5 hrs.	\$1825.00
8/04/20	Prepare mailing to Kees	1 hr.	\$365.00
8/13/20	Download documents: Motion for Summary Judgment	1 hr. 30 mins.	\$547.50
8/16/20	Draft the amended complaint for filing	2 hrs.	\$730.00
8/17/20	Review Defendants' Statement of Facts_Motion for Summary Judgment.	2 hrs. 55 mins.	\$1064.58
8/18/20	Research Board of Education and contracting numbers	45 mins.	\$273.75
8/19/20	Edit amended complaint, prepare exhibits for refile and exhibit Q	5 hrs. 10 mins.	\$1885.83
8/20/20	Prepare Exhibit O for refile, call to Fed Court re Amended Complaint; Draft Motion for 2nd Amended Complaint	8 hrs. 45 mins.	\$3193.75
8/21/20	Revise and file 2nd Amended Complaint; Prepare and Draft Response to Motion for Summary Judgment	7 hrs.	\$2555.00
8/22/20	Prepare and draft response to Motion for Summary Judgment	16 hrs. 30 mins.	\$6022.50
8/23/20	Prepare and draft response to Motion for Summary Judgment	13 hrs. 30 mins.	\$4927.50
8/24/20	Prepare and draft Brief in Opposition of Motion	17 hrs.	\$6387.50
8/25/20	Review Warren's deposition testimony, Response to Remele's List and prepare affidavits; Draft Brief in Opposition of Motion; Research and draft Hearsay argument	13 hrs. 15 mins.	\$4836.25
8/26/20	Research use of documentary evidence	9 hrs.	\$3285.00
8/27/20	Research false purported legitimate reasons	7 hrs.	\$2555.00
8/31/20	Research limitations on affidavits_summary judgment; Draft Fed. R. Evid. analysis of Remele's List	5 hrs.	\$1825.00
9/01/20	Draft Fed. R. Evid. analysis of Remele's List	3 hrs. 43 mins.	\$1356.58
9/02/20	Draft Response Prima Facie Case	11 hrs.	\$4015.00
9/03/20	Draft Response Prima Facie Case	16 hrs.	\$5840.00

9/04/20	Draft Response Inadmissible hearsay Calls to Johnson; calls to Virco; Draft Response to Legitimate Reason	7 hrs. 54 mins.	\$2883.50
9/05/20	Draft Response to Legitimate Reasons	9 hrs. 37 mins.	\$3510.08
9/06/20	Draft Response to Legitimate Reasons & draft pretext	13 hrs.	\$4745.00
9/07/20	Draft Pretext argument; draft retaliation argument	8 hrs. 20 mins.	\$3041.67
9/08/20	Proofread and revise Response	19 hrs.	\$6935.00
9/09/20	Proofread and revise Response; file Response; determine problem with filing of exhibits	10 hrs.	\$3650.00
9/14/20	Draft Supplemental Disclosure Damages	1 hour	\$365.00
9/15/20	Revise Supplemental Disclosure & Serve	35 mins.	\$212.92
9/24/20	Review Filings in Deseg case regarding facilities Plagiarism check and review of McNulty Thesis	2 hrs.	\$730.00
9/26/20	Review and download defendants reply and motions	30 mins.	\$182.50
9/27/20	Research and draft response to Motion to Strike	25 mins.	\$152.08
9/28/20	Draft Response to Motion Strike	14 hrs. 20 mins.	\$5231.67
9/29/20	File response to motion to strike; Review Reply and Motion for supplemental motion for summary judgment; Response to Motion for supplementary summary judgment	2 hrs. 45 mins.	\$1003.75
9/30/20	Research motion to file supplement brief to motion for summary judgment	7 hrs. 20 mins.	\$2676.67
10/01/20	File response to Motion to file supplemental brief draft Surreponse [labeled Surreply]	4 hrs. 20 mins.	\$1581.67
10/02/20	Review Reply; frame surresponse; review deseg docket, draft surresponse and file. Email Dr. Warren	16 hrs. 30 mins.	\$6022.50
10/05/20	Draft Motion in Limine & Brief Facilities	5 hrs. 30 mins.	\$2007.50
10/06/20	Draft Brief in support Review Deseg Facilities Docs	1 hr. 40 mins.	
10/08/20	Draft Motion in Limine & Brief Facilities	6 hrs. 15 mins.	\$2281.25
10/09/20	Draft Motion in Limine & Brief Facilities; research equitable estoppel	13 hrs. 5 mins.	\$4775.42
10/10/20	Draft equitable estoppel argument; Draft response to Motion to Strike Surreresponse	10 hrs.	\$3650.00
10/11/20	Draft response to Motion to Strike Surreresponse	10 hrs. 50 mins.	\$3954.17
10/12/20	File Response to Motion to Strike Surreresponse; Revise Motion in Limine Facilities	1 hr. 30 mins.	\$547.50
10/14/20	Revise Inconsistent Positions insert to Motion in Limine Facilities	4 hrs. 45 mins.	\$1733.75
10/15/20	Draft 2 <sup>nd</sup> Motion in Limine Remele & Gillen Lists	2 hrs.	\$730.00
10/16/20	Draft 2 <sup>nd</sup> Motion in Limine Remele & Gillen Lists	17 hrs. 30 mins.	\$6387.50
10/18/20	Draft pretrial disclosures; Revise 2 <sup>nd</sup> Amended Complaint, exhibit list, and file	8 hrs.	\$2920.00

10/19/20	Edit pretrial disclosures	12 hrs. 20 mins.	\$4380.00
10/20/20	Draft Response to Defs First Motion in Limine	9 hrs. 50 mins.	\$3589.17
10/21/20	Draft Response to Defs First Motion in Limine	45 mins.	\$273.75
10/22/20	Draft Motion to Strike Response to First Motion in Limine as untimely, review brief in support of Response to Motion	45 mins.	\$273.75
10/23/20	Review Defs Supplemental Brief Contract Claim	6 mins.	\$36.50
10/26/20	Draft Supplemental Pretrial Disclosures	2 hrs. 45 mins.	\$1003.75
10/27/20	Email Cody Kees re FOIA, email from Court Deputy, text Dr. Warren, email to Austin Porter, call to Assistant regarding exhibits and WD&D files; Draft Response to Supplemental Brief, Search ADE website for evaluation standards for superintendents	4 hrs. 27 mins.	\$1624.25
10/28/20	Draft Response to Supplemental Brief, Westlaw search Ark. Code Ann 6-13-620 Review Certified Personnel Policies	6 hrs. 45 mins.	\$2463.75
10/19/20	Draft & file response to supplemental brief	45 mins.	\$273.75
11/01/20	Draft objections to Pretrial disclosures	2 hrs. 30 mins.	\$912.50
11/02/20	Search Ashley County newspaper & Crossett School District Minutes; Draft objection to Pretrial disclosures, Research Fed. R. Evid. 26(a)(3)(A)(i), email Austin Porter, draft exhibits. Call to/from Dr. Warren	7 hrs. 55 mins.	\$2889.58
11/03/20	Emails to and from Mr. Porter; Review authority for drafting Instructions, review supplemental responses to Plaintiff's first set of interrogatories; Email Dr. Warren	3 hrs. 36 mins.	\$1314.00
11/04/20	Review and Select 8 <sup>th</sup> Cir. Jury Instructions	9 hrs. 40 mins.	\$3528.33
11/09/20	Review exhibit compilation	3 hrs.	\$1095.00
11/12/20	Review model Jury Instructions, modify instructions	2 hrs.	\$730.00
11/13/20	Revise Jury Instructions for filing	7 hrs. 30 mins.	\$2737.50
11/25/20	Review jury instructions for submission as Word doc; draft questions for witnesses and trial preparation	4 hrs. 45 mins.	\$1733.75
11/27/20	Review jury instructions for submission as Word doc; submit; draft questions for trial	1 hr. 40 mins.	\$608.33
	<b>2021</b>		
05/05/21	Text to Warren; email to Austin Porter, review distinctions Ed.D. & Ph.D.,	40 mins.	\$243.33
05/06/21	Email law clerk regarding calls to female applicants	20 mins.	\$121.67
05/10/21	Email law clerk; email female applicants; draft questions, call Dr. S. McNeely, download resumes	50 mins.	\$304.17
05/11/21	Review article on nondisclosure agreements	30 mins.	\$182.50

05/12/21	Text to Dr. Warren; Call from Dr. Warren	15 mins.	\$91.25
06/01/21	Calls to Ricky Hicks, emails to Little Rock and Pine Bluff Attorneys regarding contacting Ricky Hicks	1 hr.	\$365.00
06/06/21	Prep for Telephone interview with Drs. Newman and Davis	1 hr. 30 mins.	\$547.50
06/07/21	Prep for Telephone interview; Telephone interview Drs. Davis and Newman Ray and Associate Consultants	4 hrs. 30 mins.	\$1642.50
06/09/21	Prepare exhibits for official exhibit and witness List; locate contact info for James P. Harris (finalist)	4 hrs. 15 mins.	\$1551.25
06/10/21	Call to Superintendent James Harris(finalist)	11 mins.	\$66.92
06/16/21	Call from Dr. Warren; Survey mediators' reputation Confer with co-counsel; Revise Damages Profile Watch June 8, 2021, Part 1 PCSSD Board Meeting	7 hrs. 25 mins.	\$2707.08
06/17/21	Confer with co-counsel; Call to Dr. Warren	2 hrs. 6 mins.	\$766.50
06/24/21	Call to James Harris (finalist); Call to Dr. Bowles, Call to Atty Ricky Hicks; Research McCurdy Charter School Call to Dr. Bowles, review notes	4 hrs. 37 mins.	\$1685.08
06/28/21	Call from Mediator Frank Hamlin	30 mins.	\$182.50
06/29/21	Review 8 <sup>th</sup> Circuit and Arkansas cases "good faith negotiations;" text message to Dr. Warren Call from Dr. Warren	6 hrs. 30 mins.	\$2372.50
06/30/21	Draft statement of present intention to mediate; Emails to and from Cody Kees; Text message to Dr. Warren; Email to Austin Porter regarding mediation schedule	2 hrs. 25 mins.	\$882.08
7/01/21	Text message to Dr. Warren; Call from Dr. Warren	15 mins.	\$91.25
7/15/21	Call to Carl Davis	11 mins.	\$85.17
7/15/21	Review Deseg Opinion; Email questions to Dr. Warren	3 hrs. 10 mins.	\$1155.83
7/15/21	Calls to: Cherrie Johnson, Tommy Farmer, online search John Tackett, Jerry Holder	1 hr.	\$365.00
7/16/21	Draft Mediation Position Statement	3 hrs. 23 mins.	\$1234.92
7/17/21	Draft Mediation Position Statement	1 hr. 32 mins.	\$559.67
7/18/21	Review Judge Marshall's May 2021 opinion, Revise Mediation Position Statement	4 hrs.	\$1654.67
7/19/21	Revise Mediation Position Statement; email Austin Porter and Dr. Warren; Research Ark. Code Ann § 6-13-623; Call from Dr. Warren; Email revised Mediation Position Statement	6 hrs. 51 mins.	\$2518.50
7/20/21	Revise Mediation Position Statement and Objectives Calls to witnesses Cherri Johnson & Tommy Farmer	4 hrs. 49 mins.	\$1758.08
7/21/21	Call from Dr. Warren; Review Atty Gen. Opinion Ark. Code Ann 6-13-623	36 mins.	\$219.00
7/22/21	Call from Dr. Warren; Review and revise proposed public apology; Revise negotiation strategy	53 min.	\$322.42

7/23/21	Review mediation position, deliver docs and meet Frank Hamlin; retrieve docs from Office Depot	2 hrs. 30 mins.	\$918.58
7/29/21	Prep for mediation	13 hrs.	\$4745.00
7/30/21	Prep for and attend mediation	10 hrs.	\$3650.00
8/2/21	Draft FOIA, email Ms. Duff, text Tommy Farmer, review jury awards 8 <sup>th</sup> Circuit	1 hr. 30 mins.	\$547.50
8/3/21	Text reminder to Tommy Farmer, text to Norma Dixon, text to Dr. Warren, review pre-trial disclosures	1 hr.	\$365.00
08/04/21	Emails to and from Beverly Cornelius re FOIA; Research ACRA; submit FOIA #2; Review FOIA Documents; review PCSSD Facilities Proposal	5 hrs. 30 mins.	\$2007.50
08/05/21	Draft PCSSD Historical Litigation profile	3 hrs. 10 mins.	\$1155.83
08/08/31	Draft FOIA	30 mins.	\$182.50
08/10/21	Review motion for protective order; research and update case authority	4 hrs. 30 mins.	\$1642.50
08/11/21	Draft response to motion for protective order	11 hrs. 12 mins.	\$4088.00
08/12/21	Draft response to motion for protective order	5 hrs. 12 mins.	\$1898.00
08/13/21	Call to Judge Miller's Courtroom Deputy Email to Judge Miller's Chambers Expedite Ruling on motion; email from Courtroom Deputy; review court order; email Dr. Warren	45 mins.	\$273.75
08/16/21	Review FOIA production Punitive Damages Reprehensible: Settlement search	1 hr. 30 mins.	\$547.50
08/17/21	Reprehensible: Settlement search	2 hrs. 11 ins	\$796.92
08/18/21	FOIA Review and Trial Prep	4 hrs. 20 mins.	\$1581.67
08/20/21	Trial Prep_Draft Closing Argument, call to Davis Process Server; email Cody Kees	6 hrs.	\$2190.00
08/21/21	Trial Prep_Witnesses Facilities	6 hrs. 38 mins.	\$2421.17
08/22/21	Trial Prep_Witnesses Facilities Call to Tommy Farmer; call to Curtis Johnson	8 hrs. 8 mins.	\$2968.67
8/23/21	Research and Draft Motion for Remote Appearance of Witness	9 hrs. 10 mins.	\$3345.83
8/24/21	Document Inspection PCSSD Susan Alford; Call to Dr. Fritz Hill re Mr. Willie Morris Draft subpoena and letters to process servers; call from Dr. Warren. Draft subpoena	7 hrs. 13 mins.	\$2634.08
8/25/21	Finalize Motion for Remote Appearance; mail subpoena; calls (2) Willingham & Springer	4 hrs. 25 mins.	\$1612.08
8/26/21	Draft subpoenas for PCSSD employees, email FOIA PCSSD, Calls to witnesses: Margie Powell and Melinda Johnson; Call to Fed. Clerk's Office Northern District of Iowa,	7 hrs. 45 mins.	\$2828.75
8/27/21	Email to Davis Process Service; Draft questions for Molly Schwarzhoff; Email to Ray and Associates.	8 hrs.	\$2920.00

	Drive to and tour Mills; Email private investigator re home addresses for PCSSD employees; email Davis Process Service. Phone interview and locate Cedar Rapids, IA process server. Text message to Dr. Warren		
8/28/21	Prepare Schwarzhoff subpoena and documents for service, call to Rich Gradient (Impact Process Service) email Impact Process Service	3 hrs. 43 mins.	\$1356.58
8/29/21	Call to Michelle Johnson	6 mins.	\$36.50
8/30/21	Call to Impact Process Service; email to courtroom deputy and Iowa clerk regarding remote appearance of witness; Email Kees re deposition video for Johnson; Call to Davis Process; Reissue subpoenas and affidavits for Service;	6 hrs. 50 mins.	\$2494.17
8/31/21	Prep for interview and interview Willie Morris;	3 hrs.	\$1095.00
9/01/21	Research and prepare subpoena; draft Motion for Trial Deposition, email exchange with Cody Kees; call and text with Michelle Johnson	10 hrs. 30 mins.	\$3832.50
9/02/21	Draft checks for process server; draft letter Schwarzhoff; Call to Superintendent Senn; Call to Davis Process Service	5 hrs. 30 mins.	\$2007.50
9/03/21	Review order re trial brief; email Cody Kees Draft letter to Schwarzhoff	1 hr. 6 mins.	\$401.50
9/04/21	Research Rule 45 and corporate defendant's employees	1 hr. 52 mins.	\$681.33
9/05/21	Locate and Contact Witnesses; draft general cover letter for subpoenas	6 hrs. 30 mins.	\$2372.50
9/06/21	Call to Davis Process Service and other process servers, revise subpoenas; text to Janice Warren; research audits and auditor; research ADE FOIA custodian, draft request	5 hrs. 10 mins.	\$1885.83
9/07/21	Calls to Davis Process Service; call from Dr. Guess; revise FOIA, trial preparation-draft questions; review Judge Miller's 2011 Opinion; email exchange with Lori Freno, ADE General Counsel, re Motion to quash subpoena; review draft documents; email FOIA request ADE	12 hrs.	\$4380.00
9/08/21	Complete review Miller Opinion; Calls to Davis Process Service, Emails to & from ADE General Counsel, Research Fed R. Evid 902 and 803, Call and emails to Houston Independent School District General Counsel, Draft certification, Review cabinet job descriptions, Email Cody re Johnson deposition, Review monitoring performance grid	10 hrs. 9 mins.	\$3704.75
09/09/21	Review Commissioner Key's Motion to Quash Subpoena; Research Fed. R. Civ. Pro. 45(d)(3) draft	9 hrs.	\$3285.00

	Response; review FOIA response ADE, email Kincade		
9/10/21	Draft & revise Response and Brief; file Response; emails to Davis Process Services re designated witnesses; compile supplemental disclosures; email Cody	13 hrs. 40 mins.	\$4988.33
9/12/21	Prepare witness and exhibit lists, email Schwarzhoff, draft letter to Process Server Dewayne Hall (Brewer Service)	7 hrs. 56 mins.	\$2895.67
9/13/21	Revise Response to Settlement Offer; Review: Plan 2000 requirements and Asst. Sup. Job Description; draft outline for closing argument	14 hrs. 13 mins.	\$5189.08
9/14/21	Call to Professor Allen re Iowa employment lawyer, call to employment attys, research custodian of records	8 hrs. 30 mins.	\$3102.50
9/15/21	Engage Iowa local counsel; notify counsel re Order rescheduling trial date,	13 hrs. 30 mins.	\$4927.50
9/16/21	Research extension of subpoena's command to appear, email Cody on opposition to Motion to extend; text to Dr. Warren, draft motion and brief in support. File motion and brief.	8 hrs. 5 mins.	\$2950.42
9/20/21	Prepare supplemental response, prepare exhibits	2 hrs. 30 mins.	\$912.50
9/21/21	Call from ADE General Counsel, Lori Froner; Review WD&D emails Draft certification for Com'er Key	4 hrs. 42 mins.	\$1715.50
9/24/21	Prepare supplemental response and pre-trial disclosure, emails regarding witness flash; email to Valerie Bailey regarding FOIA documents; Emails to and from Dr. Warren	6 hrs. 14 mins.	v2275.17
9/26/21	Research 902 certification for FOIA documents (ADE)	1 hr. 30 mins.	\$547.50
9/27/21	Respond to email and call from Iowa attorneys	35 mins.	\$212.92
9/28/21	Email Molly Schwarzhoff's attorney Call to Brittney Kincaid ADE re FOIA Draft certification for ADE documents; call to witness and scheduling of meeting	4 hrs. 19 mins.	\$1575.58
9/29/21	Revise Draft certification for ADE documents; review 8th Cir cases Fed. R. Evid 803 and 902	4 hrs. 17 mins.	\$1563.42
10/01/21	Copy and Email Commissioner Key's witness fee checks for Davis Processing; Call from Attorney for Molly Schwarzhoff, Molly's attorney; Email to Terri Davis, Warren's Cedar Rapids attorney	27 min.	\$164.25
10/02/21	Email to Davis Processing re credit for Commissioner Key's witness fee checks;	5 mins.	\$30.42

10/03/21	Email to Iowa Attorneys, Terri Davis and Robert Montgomery, Molly's attorney, and Molly Schwarzhoff; email to Montgomery, Molly's attorney	20 mins.	\$121.67
10/4/21	Email to Iowa Attorneys and Molly Schwarzhoff; email to Robert Montgomery, Molly's attorney	5 mins.	\$30.42
10/18/21	Draft Remele subpoena, call to Bolden Process Service	36 mins.	\$219.00
10/29/21	Review Arkansas Statutes on State Board of Education documents, email to Dr. Warren	31 mins.	\$206.83
11/01/21	Pay Iowa Attorney's Bill, review email to Robert Montgomery, Schwarzhoff's atty, call to Montgomery	28 mins.	\$170.33
11/02/21	Email Austin Porter re Motion in Limine; draft email to Lori Freno, call to Annette Barnes, former director of ADE Deseg Division Review State Board of Education's Minutes 2017; Call to Willie Morris;	2hr 25 mins.	\$882.08
11/03/21	review documents for supplemental response	1 hr. 58 mins.	\$717.83
11/04/21	review documents and compile for supplemental response; emails from and to Robert Montgomery Schwarzhoff's attorney	1 hr. 5 mins.	\$395.42
11/05/21	review documents and compile for supplemental response; review Ashley County Ledger articles	5 hrs. 40 mins.	\$2068.33
11/06/21	review documents and compile for supplemental response	5 hrs. 20 mins.	\$1946.67
11/08/21	review documents and compile for supplemental response	3 hrs. 45 mins.	\$1368.75
11/10/21	Draft email to Cody Kees re Billing Statements, review FOIA production	3 hrs.	\$1095.00
11/12/21	Finalize supplemental production	4 hrs. 37 mins.	\$1685.08
11/13/21	Email supplemental production to Cody Kees	30 mins.	\$182.50
11/18/21	Call from Davis Process Service	30 mins.	\$182.50
11/22/21	Email from Ray and Associates' attorney, Robert Montgomery, review and reply, provide requested documents; call from Schwarzhoff's atty; Prep for Schwarzhoff zoom re testimony	7 hrs. 12 min.	\$2628.00
11/23/21	Prep for Schwarzhoff zoom, email to Austin Porter Interview with Schwarzhoff	4 hrs. 30 mins.	\$1642.50
11/25/21	Read and index Gillen deposition	4 hrs. 3 mins.	\$1478.25
11/26/21	Draft summary Gillen deposition	4 hrs. 41 mins.	\$1709.42
11/27/21	Research and review §1983 jury instructions Prepare supplemental disclosures; text to and from Dr. Warren, email disclosures to Cody Research nondelegable duties (8 <sup>th</sup> Circuit & Arkansas)	6 hrs. 46 mins.	\$2469.83

11/28/21	Prepare Closing Argument Prepare filing of pretrial exhibits & witnesses Text Dr. Warren	5 hrs. 57 mins.	\$2171.75
11/29/21	Revise Exhibit List for filing Call to Jill Hawkins, Clerk Federal District Court, Northern District of Iowa, Call to Judge Millers' courtroom deputy, Email to Robert Montgomery (Schwarzhoff); Calls to Houston Indep. School District; Email to HISD, revise certification	5 hrs. 56 min.	\$2165.67
11/30/21	Revise ADE Certification, email Judge Miller's Courtroom Deputy, email to Cody, Jay, and Porter; email to ADE; email to Warren	1 hr. 21 mins.	\$492.75
12/1/21	Emails and text re new trial date; Email to Dr. Warren; Email from Dr. Warren; research multiple awards Title VII	3 hrs. 16 min.	\$1192.33
12/2/21	Email to courtroom deputy and all counsel; email from courtroom deputy; email to Cody re opposition to modification of subpoenas. Draft motion for order modifying subpoenas, revise brief in support, draft notice; calls to two witnesses (Guess & Powell); call to legal assistant re mail merge for notices; Research modifying subpoenas cases; Review Multiple award cases	8 hrs. 22 min.	\$3053.83
12/3/21	Email from ADE Atty Freno, email from Cody re motion, Review Brief, Motion, & exhibit for extension of subpoenas, file motion	2 hrs.	\$730.00
12/4/21	Calculate mileage per witness, organize subpoena, emails to Bolden	1 hr.	\$365.00
12/6/21	Research same action, separate injuries	2 hrs. 27 mins.	\$894.25
12/8/21	Research at will employee; express agreements in handbooks or policies, damage remedy for jury instructions; Meet with Legal Asst, review letters and mailing for letters to subpoenaed witnesses Draft checks	5 hrs. 45 min.	\$2098.75
12/09/21	Email Iowan process server, Call to Courtroom Deputy regarding order modifying subpoenas Observe Employment Discrimination Trial	30 mins.	\$182.50
12/10/21	Draft Motion and Brief for Order Clarifying Order	1 hr. 25 min.	\$517.08
12/13/21	Revise Exhibit List	3 hrs. 45 min.	\$1368.75
12/14/21	Revise Exhibit List	2 hrs. 46 min.	\$1009.83
12/16/21	Calls to witnesses; Prepare for meeting with Dr. Warren	5 hrs. 22 min.	\$1958.83
12/17/21	Research limits on compensatory damages Meet with Dr. Warren	1hr. 40 min.	\$608.33
12/20/21	Prep for witness interview Fitzgiven,	2hrs. 50 min.	\$1034.17

	drive to interview & interview		
12/23/21	Update exhibit books with Legal Asst	2 hrs.	\$730.00
12/26/21	Review affidavit of service Schwarzhoff (2 <sup>nd</sup> ), draft letter to process server	30 min.	\$182.50
12/28/21	Email exchange with Cody Kees regarding Remele subpoena and her destruction of checks	15 min.	\$91.25
12/29/21	Review authority on extent of recovery Email Cody Kees Review authority & draft position paper: extent of recovery, multiple Title VII Claims	4hrs. 31 min.	\$1648.58
12/30/21	Review authority & draft position paper: extent of recovery	2 hrs. 49 min.	\$1028.08
01/01/22	Substantive Prep: directed verdict, emotional distress, extent of recovery	4 hrs.	\$1460.00
01/02/22	Call to Yvone West, email Yvone West, search exhibit, email Warren (2); search for Auditor Stacie Deane	2hrs. 42 min.	\$985.50
01/04/22	Email Pam Fizgiven; Draft FOIA; call to Stacie Dearen (Legislative Audit)	1 hr. 44 min.	\$632.67
01/04/22	Email FOIA #2, email ADE Counsel Lori Freno	30 min.	\$182.50
1/5/22	Emails to & from Lori Freno, emails from Cody Keys, review: case authority Ark FOIA in Federal Court (2) Judge Miller's ruling; emails to Cody Keys. Review FOIA production #7 Monitoring	4 hrs. 25 min.	\$1612.08
01/6/22	Emails to and from Valerie Bailey, Cody Kees regarding FOIA; Emails from and to Lori Freno re certification of ADE documents; review FOIA docs; email to Austin updating FOIA issue; email to Principal West, email exchange with Warren	13 hrs. 30 min.	\$4933.58
01/7/22	Email to Cody Kees re FOIA #2 Call from Dr. Warren Draft Motion to Compel and Brief in Support, review docs submitted by Cody Kees, email Cody Kees, pull and review cases and AG's Opinions, revise Brief in Support	10 hrs. 21 min. .	\$3777.75
1/8/22	Prepare exhibits for Motion to Compel, review and print emails, revise drafts-request in camera inspection; Finalize exhibits, file motion, provide courtesy copies to Judge Miller's Chamber, email Dr. Warren	7hrs. 13 min.	\$2634.08
1/9/22	Review Shelby Thomas' Deposition	30 min.	\$182.50
1/10/22	Review defendants' motion to regulate FOIA; draft response to defendants' motion	18 min.	\$109.50
1/11/22	Review defendants' motion to regulate FOIA; draft response to defendants' motion and brief in support	18 hrs. 13 min.	\$6649.08
1/12/22	draft and file brief in support to defendants' motion	4 hrs. 56 min.	\$1800.67

1/13/22	Review FOIA #1 docs, draft Pre-Trial Disclosures	4 hrs. 20 min	\$1581.67
1/14/22	Emails from/to Cody Kees; Emails from/to Austin Porter, Review FOIA docs	4 hrs. 43 min.	\$1721.58
1/15/22	Review FOIA 1.2 docs	2 hrs.	\$730.00
1/16/22	Review and research damages	5 hrs. 6 min.	\$1861.50
1/17/22	Review FOIA 1.3 docs Review Title VII and § 1981 Cases Research Supplemental Claims	6 hrs. 36 min.	\$2409.00
1/18/22	Review witness list, email Lori Freno, email Legal Assistant, email Cody re malware, calls to witnesses: Palmer, Watson, Burgess, McCraney	1 hr. 45 min.	\$638.75
1/19/22	Review FOIA responses 1-3 Review Pre-trial Disclosures, File Amended Disclosures, provide Courtroom Deputy with a copy of both documents, call to Clerk's Office modify the title of the Amended Disclosures; Review Damages cases	9 hrs. 12 min.	\$3358.00
1/20/22	Review cases for opening and closing statements: pretext, adverse action, damages	4 hrs. 57 min.	\$1806.75
1/21/22	Email from and to Cody Kees Provide defendants with supplemental disclosures	1 hr. 10 min.	\$425.83
1/22/22	Review cases Damages Emotional Distress; Witness notification of witnesses; Draft subpoenas	5 hrs. 17 min.	\$1928.42
1/24/22	Review FOIA docs	1 hr.	\$365.00
1/25/22	Review defendants' response Motion to Compel Call from Dr. Warren, send documents	57 min.	\$346.75
1/26/22	Review FOIA Docs; Calls to and from Legal Asst re exhibits; Call from Dr. Warren; Calls to Regus Compile doc for supplemental disclosure; review FOIA docs	4 hrs. 18 min.	\$1569.50
1/27/22	Email to Lori Freno re Letter to Dr. Guess from Willie Morris; Meet with witness [Roush]; Draft FOIA complaint	5 hrs.	\$1934.50
1/28/22	Research FOIA jurisdiction; Draft FOIA complaint Emails to & from Cody; email from and call to Deb Roush; Draft Motion in <i>Limine</i> Contract	6 hrs. 26 min.	\$2348.17
1/29/22	Call from process server; prepare subpoenas for service; meet with process server Emails from and to Porter; Research damage provisions for jury instructions	2 hrs. 53 mins.	\$1052.42
1/30/22	Review Shelby Thomas' Deposition; formulate questions for Board members	2 hrs. 30 mins.	\$912.50
1/31/22	Prep Witness for Testimony; Email from and to Lance LeVar; Review & revise jury instructions	1 hr. 31 mins.	\$553.58

02/01/22	Review motion & response to contract claim; schedule conference with Austin Porter; revise jury instructions Breach of Contract; Zoom with Lance LeVar; Revise burden of proof, salary & benefits comparison Smith & Warren; Warren & McNulty	13 hrs. 26 mins.	\$4903.17
2/2/22	Revise instructions Breach of Contract, Draft preliminary instructions for the Court; Email Porter, and Cody Kees re jury instruction Compare Plaintiff & defendants drafts of instructions	9 hrs.46 min.	\$3564.83
2/3/22	Compare Plaintiff & defendants drafts of instructions Draft Motion for Reconsideration/clarification; Review candidate chart preparation, call from Dr. Warren.	11 hrs. 6 min.	\$4051.50
2/4/22	Draft Brief in Support Review defendants jury instructions, email Cody Kees	3 hrs. 10 min.	\$1155.83
2/5/22	Review defendants Motion in Limine, pull docs	45 min.	\$273.75
2/6/22	Draft response to defendants 2 <sup>nd</sup> motion in limine Punitive damages; Prep for and call with Dr. Warren; Review & file response defendants Motions in Limine; Prep exhibits & Schwarzhoff testimony	9 hrs. 5 min.	\$3315.42
2/7/22	Prep exhibit & Schwarzhoff testimony	42 min.	\$255.50
2/8/22	Prep exhibits, respond to emails from Cody Kees, emails to and from Courtroom Deputy; email to Clerk's office Cedar Rapids; Calls to witnesses <u>Research proof of punitive damages</u>	14 hrs. 56 min.	\$5450.67
2/9/22	Prep exhibits; call witness: Emma Watson(2) call from Forrest; Confer with Norman Hill Prep exhibits; email Kees re stipulation of exhibits; email exchange with Legal Asst re exhibits; Email Bichlmeire re visit to courtroom; <u>Review proof of punitive damages</u>	9 hrs.23 min.	\$3424.92
2/10/22	Prep opening statement Email exchange courtroom deputy re visit to courtroom (2)	3 hrs.	\$1095.00
2/11/22	Revise exhibits and charts; confer with Porter re exhibits & voir dire; email exchange Lori Freno (ADE); email exchange with Witness Forrest; revise Pretrial Disclosures and file; call from Dr. Warren. Draft Questions for Direct Examination Reply to Kees email re supplemental production	15 hrs. 51 min.	\$5785.255
2/12/22	Draft Questions, draft closing argument	14 hrs. 18 min.	\$5219.50
2/13/22	draft closing argument, modify exhibit, review ASBA Handbook, email Porter	12 hrs. 11 min.	\$4446.92
2/14/22	Trial prep opening statement; attend trial	17 hrs. 7 min.	

			\$6247.58
2/15/22	Prep for witnesses and attend trial	15 hrs. 4 min.	\$5499.33
2/16/22	Prep for witnesses	13 hrs. 45 min. .	\$5018.75
2/17/22	Prep for witnesses and attend trial  Prep for witnesses	15 hrs.51 min.	\$5785.25
2/18/22	Prep for witnesses Attend trial	17 hrs. 40 min.	\$6448.33
2/19/22	Draft Motion to Strike, Curative Instruction, and Brief; confer with co-counsel; file Motion to Strike and Brief	10 hrs.	\$3893.33
2/20/22	Review jury instructions, research injunctive relief Prepare exhibit summary for damages; Email Porter re damage calculation; Review materials for Warren's testimony prepare Dr. Warren for testimony	5 hrs. 29 min.	\$2001.42
2/21/22	Review Response to Motion to Strike; Call from Austin Porter; Emails from & to Judge Miller Revise exhibit summary for damages; Prepare Dr. Warren for testimony; Review Jury Instructions	5 hrs. 33 min.	\$2025.75
2/22/22	Prepare closing argument: rubric as pretext; email to Clerk-Cedar Rapids District Court; Drive to courthouse; Dr. Warren's testimony; Carl Davis' testimony; Prepare closing argument	14 hrs. 44 min.	\$5377.67
2/23/22	Review draft-final instructions prepare closing argument & exhibit selection Drive to courthouse; closing arguments	10 hrs. 40min.	\$3893.33
2/25/22	Prep for post-trial relief; Attend Judge Baker's receipt of verdict and remove materials from the courthouse	4 hrs. 39 min.	\$1697.25
2/26/22	Email Austin Porter re equitable relief and post- trial motions; Review time records; Confer with Austin Porter re post-trial motions; Review time records	3 hrs. 34 min.	\$1301.83
2/27/22	Research and Draft response to uphold PCSSD's Liability pursuant to § 1983	3 hrs. 45 min.	\$1368.75
2/28/22	PCSSD's Liability pursuant to § 1983; PCSSD's Liability pursuant to § 1981	5 hrs. 5 min.	\$1855.42
3/1/22	Draft response to directed verdict/JNOV	17 hrs.	\$6235.42
3/2/22	Draft response to directed verdict/JNOV	10 hrs. 26 min.	\$3808.17
3/3/22	Review billing records	3 hrs. 16 mins.	\$1192.33
3/11/22	Draft Rule 59e Motion Reconsideration	1 hr. 45 mins.	\$638.75

3/14/22	Draft Rule 54d Motion	34 min.	\$225.08
3/15/22	Draft Rule 54d Motion; Review Motion for Equitable Relief	9 hrs. 56 min.	\$3625.67
3/16/22	Draft Rule 54d Motion Email from & to Austin Porter; Draft Rule 54d Motion	2 hrs. 3 min.	\$748.25
3/17/22	Review draft of Motion & Brief for Equitable Relief, email Dr. Warren; email Porter Draft Rule 54d Motion_research PCSSD's litigation and settlement pattern	2 hrs. 25 mins.	\$882.08
3/18/22	Draft Rule 54d Motion_research PCSSD's litigation and settlement pattern	2 hrs.	\$730.00
3/21/22	Review and revise draft of Amended and substituted Motion & Brief for Equitable Relief	2hrs.	\$730.00
3/22/22	Email from and to Porter; Review Defs Motion JNOV	4 hrs. 33mins.	\$1660.75
3/24/22	Review Defs Motion JNOV; Research Title VII 703 & 704	6 hrs. 27 mins.	\$2354.25
3/25/22	Research Sec 1981, Title VII 703, & 704	3 hrs. 40 mins.	\$1338.33
3/27/22	Draft Introduction, Statement of Facts of Brief in Support of Response	5 hrs. 47 mins.	\$2110.92
3/28/22	Draft Brief in Support of Response to Motion for JNOV	7 hrs. 45 mins.	\$2828.75
3/29/22	Draft Brief in Support Response to Motion for JNOV	10 hrs. 44 mins.	\$3917.67
3/30/22	Draft Brief in Support Response to Motion for JNOV	8 hrs. 50 mins.	\$3224.17
3/31/22	Call to Court Reporters to request testimony; Draft Brief in Support of Response to Motion for JNOV	10 hrs. 58 mins.	\$4002.83
4/1/22	Draft Brief in Support of Response to Motion for JNOV	6 hrs. 50 mins.	\$2494.17
4/2/22	Draft Brief in Support of Response to Motion for JNOV	7 hrs. 45 mins.	\$2828.75
4/3/22	Draft Response and Brief in Support of Response to Motion for JNOV	3 hrs. 44 mins.	\$1362.67
4/4/22	Draft Response and Brief in Support of Response to Motion for JNOV	4 hrs. 54 mins.	\$1788.50
4/5/22	Draft Response and Brief in Support of Response to Motion for JNOV	8 hrs. 42 mins.	\$3175.50
4/19/22	Draft time records	1 hr.	\$365.00
4/21/22	Review notice of Order; call to Dr. Warren	10 mins.	\$60.83
4/22/22	Review notice of Order; call to Dr. Warren	52 mins.	\$316.33
4/23/22	email court reporters regarding Dr. Warren's testimony; read cases research proof of mitigation	3 hrs. 20 mins.	\$1216.67
4/24/22	email from and to court reporter; review cases on proof of front pay	1 hr. 40 mins.	\$608.33
4/25/22	research proof of failure to mitigation	22 mins.	\$133.83
4/27/22	research proof of failure to mitigation	2 hrs. 25 mins.	\$882.08
4/28/22	Unreasonable distance; Emails re counsel affidavits, texts from Dr. Warren; call from Dr. Warren, review Conway	6 hrs. 10 mins.	\$2250.83

	Public School & LRSD info; review docket for PCSSD's trial; review trial testimony		
4/29/22	Research NLRB cases; text to and from Dr. Warren;	5 hrs.	\$1825.00
4/30/22	Failure to promote cases; prepare outline of brief; Draft brief and comparison chart of district characteristics	12 hrs. 44 mins.	\$4647.67
5/1/22	Complete draft of brief	12 hrs. 19 mins.	\$4495.58
5/2/22	Email to and from Dr. Warren; revise brief; File Motion for Reconsideration; Addendum	9 hrs. 55 mins.	3619.58
5/11/22	Review schedules, Prepare docs for Motion 54d & Sanctions	3 hrs. 40 mins.	\$1338.33
5/12/22	Prepare docs for Motion 54d filing	5 hrs. 45 mins.	\$2098.75
5/13/22	Review case authority on standards for recovery of attorney's fees and the scope of recovery	5 hrs. 31 mins.	\$2013.58
5/15/22	Draft Introduction & Statement of Facts	1hr. 30 mins.	\$553.58
5/15/22	Draft authority	5 hrs. 54 mins.	\$2153.50
5/16/22	Draft Authority; draft Argument	2 hrs. 24 mins.	\$876.00
5/17/22	Review Exhibits for Costs; locate supporting affidavits	4 hrs.	\$1460.00
<b>Total</b>		<b>2097 hrs. 51 mins.</b>	<b>765,715.25</b>